

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

EUCLIDES SOTO, LOUIS A. MARTINEZ,
JOSE RAMIREZ, CLEMENTE HERNANDEZ,
CESAR PIZARO, ELISON PENA,
JUAN COLON, JOSE ORTIZ, RAFAEL TORRES,
ANGEL BAEZ, ANTONIO MARTINEZ,
WILFREDO ORTIZ, EULOGIO ORTIZ,
MIRRAIN MIRANDA, RAFAEL MORENO,
NELSON ACEVEDO, and
RAMON RODRIQUEZ,

Plaintiffs,

v.

SHERMAN-FEINBERG CORPORATION,
FARNSWORTH FIBRE CORPORATION,
UNITED STEELWORKERS OF AMERICA,
LOCAL 421-U, and UNITED STEELWORKERS
OF AMERICA,

Defendants.

Civil Action No.
04-10892-JLT

MOTION OF THE DEFENDANTS UNITED STEELWORKERS,
LOCAL 421-U AND UNITED STEELWORKERS FOR LEAVE TO
SUBMIT A MEMORANDUM OF LAW IN EXCESS OF TWENTY PAGES


The Defendants, United Steelworkers of America, Local 421-U and United Steelworkers of America (collectively, the Union) hereby move for leave to submit a Memorandum of Law in excess of twenty (20) pages pursuant to Local Rule 7.1(B)(4).

In support of this Motion, the Union states that the Memorandum of Law exceeds twenty pages because it addresses all of the numerous claims raised by the Plaintiffs in the complaint and because the legal issues in this case require

that the Summary Judgment Motion be supported by a Memorandum of adequate length to properly apprise the Court of the relevant facts and precedent.

Dated: July 20, 2005

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served on the attorneys of record for each party by hand delivery on July 20, 2005.



Alfred Gordon